

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KEILEE FANT et al.,)
Plaintiffs,)
v.) Case No.: 4:15-cv-00253-AGF
THE CITY OF FERGUSON,)
Defendant)

**PLAINTIFFS' MOTION TO COMPEL THE PRODUCTION OF
DOCUMENTS FROM DEFENDANT THE CITY OF FERGUSON**

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Local Rule 3.04, Plaintiffs Keilee Fant *et al.*, hereby move this Court for an order compelling Defendant the City of Ferguson (“Defendant,” “City of Ferguson,” or the “City”), to produce relevant discovery crucial to Plaintiffs’ claims and the issues for resolution in this case. The grounds for this motion are set forth in the accompanying Memorandum in support of Plaintiffs’ Motion to Compel Production of Documents from Defendant the City of Ferguson and Declaration.

CERTIFICATION

Pursuant to Local Rule 3.04, undersigned counsel certifies that counsel for Plaintiffs and counsel for Defendant met and conferred by telephone on January 2, 2020 at 1 PM CST in a good-faith effort to resolve the discovery matters that are the subject of this motion. Andrew Tomback and Danielle Audette attended the teleconference on behalf of the Plaintiffs, and William Hellmich and Blake Hill attended the teleconference on behalf of the Defendant.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 4.02(B), Plaintiffs respectfully request oral argument on this motion. Brief oral argument is warranted here to provide the Court with a complete understanding of the discovery dispute between the parties and the crucial nature of the document discovery sought by Plaintiffs. Further, oral argument will allow the parties to address any questions the Court may have regarding the dispute or the discovery at issue not sufficiently addressed in the parties' briefing.

Dated: February 27, 2020

Respectfully submitted,

By: Danielle M. Audette

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed with the Court's electronic filing system, with notice of case activity to be generated and sent electronically by the Clerk of said Court on February 27, 2020, to all counsel of record.

/s/ Danielle M. Audette